

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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KENNETH E. SAVAGE, JR.,

PLAINTIFF,

VS.

NO. 2:14-cv-02057-STA-dkv

FEDERAL EXPRESS CORPORATION,  
D/B/A FEDEX EXPRESS, FEDEX  
CORPORATION EMPLOYEES' PENSION  
PLAN, FEDEX CORPORATION RETIREMENT  
SAVINGS PLAN,

DEFENDANTS.

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DEPOSITION

OF

AMY HUTCHISON

JUNE 2, 2015

TAMMY WENDEL, LCR, CCR  
4735 Beech Bluff Road  
Beech Bluff, Tennessee 38313  
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1           The deposition of AMY HUTCHISON is  
2 taken on this, the 2nd day of June, 2015, on  
3 behalf of the Plaintiff, pursuant to notice and  
4 consent of counsel, beginning at approximately  
5 1:57 p.m. at FedEx World Headquarters, 3620  
6 Hacks Cross Road, Building B, Memphis,  
7 Tennessee.

8           This deposition is taken pursuant to  
9 the terms and provisions of the Tennessee Rules  
10 of Civil Procedure.

11           All forms and formalities, including  
12 the signature of the witness, are waived, and  
13 objections alone as to matters of competency,  
14 irrelevancy and immateriality of the testimony  
15 are reserved to be presented and disposed of at  
16 or before the hearing.

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

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ON BEHALF OF THE DEFENDANTS:

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I N D E X

Direct Examination  
By Mr. Napiltonia.....5

E X H I B I T S

(NO EXHIBITS MARKED)

PAGE

COURT REPORTER'S CERTIFICATE.....22

1 A. Yes.

2 Q. And then after 2014, who calculated  
3 it?

4 A. Aon Hewitt.

5 Q. Okay. Where is Aon Hewitt located?

6 A. The office that does the calculations  
7 is in Woodlands, Texas.

8 Q. Up in the Houston area?

9 A. Yes.

10 Q. I'm familiar with it. And it's just  
11 Aon Hewitt?

12 A. Yes.

13 Q. What relation, if any -- because in  
14 the documents that I've been provided by FedEx,  
15 I see -- and actually in the discovery, too, it  
16 states something to the effect of Mercer by way  
17 of or care of the FedEx Retirement Services  
18 Center.

19 A. (Witness nods head affirmatively.)

20 Q. What is the FedEx Retirement Services  
21 Center as it relates to Mercer?

22 A. The FedEx Retirement Service Center  
23 is Mercer.

24 Q. Oh, it is?

1           A. Yes. It's a specific group within  
2 Mercer.

3           Q. I apologize. I'm a little bit  
4 confused. So Mercer -- is Mercer the company  
5 owned by FedEx?

6           A. No.

7           Q. Okay. That's a separate entity?

8           A. Yes.

9           Q. And you testified earlier it's an  
10 actuarial firm?

11          A. That's correct.

12          Q. But -- and correct me if I'm wrong --  
13 I guess FedEx has so many employees that Mercer  
14 has dedicated a division or a work group or  
15 something?

16          A. That is true. They dedicated a work  
17 group.

18          Q. Okay. All right. And the reason I  
19 say that is when I've called -- in the plan  
20 documents, when I've called the numbers to try  
21 to ascertain addresses, it gets confusing  
22 because I'll call, for example, Aon Hewitt and  
23 they'll refer me to the FedEx Retirement  
24 Services Center.

1           A. We have a FedEx Retirement Service  
2 Center at Aon Hewitt now, as well.

3           Q. Yeah. Okay. So that's the  
4 connection.

5           A. (Witness nods head affirmatively.)

6           Q. Are these individuals at the FedEx  
7 Retirement Services Center, for example, and  
8 Aon Hewitt -- I'm just talking about the people  
9 who do the calculations.

10          A. Uh-huh (affirmative response).

11          Q. Are those FedEx employees or Aon  
12 Hewitt employees?

13          A. They are not FedEx employees. They  
14 are either Mercer or Aon Hewitt employees.

15          Q. Okay. Do you know the specific  
16 addresses to where -- physically where Mercer  
17 and where Aon Hewitt is located?

18               MR. KNOX: Joe, I don't mean to  
19 interrupt, but what topic are we under  
20 here? Because it sounds like we're  
21 getting away from the topics. I mean, I  
22 understand you want the information, and,  
23 again, you know, if it fits within a  
24 topic, okay. Otherwise, I'm going to

C E R T I F I C A T E

STATE OF TENNESSEE:

COUNTY OF MADISON:

I, TAMMY W. WENDEL, LCR, and Notary Public, Madison County, Tennessee, CERTIFY:

The foregoing proceedings were taken before me at the time and place stated in the foregoing styled cause with the appearances as noted.

Being a Court Reporter, I then reported the proceeding in Stenotype, and the foregoing pages contain a true and correct transcript of my said Stenotype notes then and there taken.

I am not in the employ of and am not related to any of the parties or their counsel, and I have no interest in the matter involved.

I further certify that in order for this document to be considered a true and correct copy, it must bear my original signature and that any reproduction in whole or in part of this document is not authorized and not to be considered authentic. Unauthorized reproduction and/or transfer will be in violation of Tennessee Code Annotated 39-14-149, Theft of Services.

Witness my signature this the \_\_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
TAMMY W. WENDEL, LCR

Notary Public at Large  
For the State of Tennessee  
My Commission Expires:  
February 24, 2016